



## U.S. Department of Justice

United States Attorney  
Southern District of New York

Jacob K. Javits Federal Building  
26 Federal Plaza  
New York, New York 10278

December 5, 2024

**VIA ECF**

The Honorable Ronnie Abrams  
United States District Judge  
500 Pearl Street  
New York, New York

Re:     *United States v. \$3,435,676.57 in United States Currency, et al.*  
          24 Civ. 9189 (RA)

Dear Judge Abrams:

On December 2, 2024, the Government filed a verified complaint (the “Complaint”) against \$3,435,676.57 in United States currency held in General Ledger Account No. 4050720 at Wells Fargo Bank, N.A., formerly on deposit in Account No. 2502560838 associated with Ocean Studios California LLC, and any and all funds traceable thereto, including accrued interest (the “Defendant-*in-rem*”). The Government respectfully writes to request that the Court issue an Arrest Warrant *In Rem* for the Defendant-*in-rem*.

As alleged in the Complaint, the United States commenced an action *in rem* to forfeit, pursuant to 18 U.S.C. § 981(a)(1)(C), the Defendant-*in-rem* as proceeds traceable to violations of the International Emergency Economic Powers Act (“IEEPA”) and IEEPA conspiracy .

The Government does not have custody of the Defendant-*in-rem*, and the funds remain in the account listed above as they are not presently subject to a judicial order. Rule G(3)(b) of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims provides that an arrest warrant *in rem* for property not yet in the Government’s possession can be issued by a Court only upon a finding of probable cause. Here, probable cause is set forth in the Complaint. The Government respectfully requests that the Court sign the enclosed Arrest Warrant *In Rem* for the Defendant-*in-rem*.

Very truly yours,

DAMIAN WILLIAMS  
United States Attorney

By:

  
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